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**From:** Wirick, Holiday [wirick.holiday@epa.gov]  
**Sent:** 2/24/2022 8:03:02 PM  
**To:** Parrish, George [Parrish.George@epa.gov]  
**Subject:** Re: Antideg question from ND- summary of discussion

Perfect, thank you!

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**From:** Parrish, George <Parrish.George@epa.gov>  
**Sent:** Thursday, February 24, 2022 12:54 PM  
**To:** Wirick, Holiday <wirick.holiday@epa.gov>  
**Subject:** RE: Antideg question from ND- summary of discussion

Sure Holly, happy to join that call. I'll update my calendar – pls pick any time that's free for me.

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**From:** Wirick, Holiday <wirick.holiday@epa.gov>  
**Sent:** Thursday, February 24, 2022 12:17 PM  
**To:** Parrish, George <Parrish.George@epa.gov>  
**Subject:** Fw: Antideg question from ND- summary of discussion

Hi George, per my email, here's some background on Pete's antideg question.

Thanks,  
Holly

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**From:** Wirick, Holiday  
**Sent:** Thursday, February 24, 2022 10:36 AM  
**To:** Moon, Dave <Moon.Dave@epa.gov>  
**Subject:** Antideg question from ND- summary of discussion

Hi Dave, as a follow-up to my email about Pete's antideg question, here's a little background on the issue. Thanks for considering being on a call with Pete.

A large agricultural corporation in Enderlin, ND, is discharging chlorides and sulfates into the Maple River, a Class 3 stream. Pete said the chlorides aren't much of a problem, but the sulfate discharge, once run through the lagoon system, is between 1000 and 3000; ND's WQC is 750 mg/L.

The company hired a consultant to help them figure out how to address the problem, suggesting they take away the drinking water use criteria on the Maple River downstream of the discharge ('since there's nobody using it'), and recalculating the aquatic life criteria. The consultant provided ND some examples in IA and UT where they've done that in certain locations and came up with sulfate numbers in the 2000-3000 range.

Pete's main question is whether he is under any obligation to honor that request. He asked is it a reasonable or an accepted process that if an industry says 'we have a substantial economic reason for doing this,' as the primacy holders of the WQS, are they obligated in some way to respond to their concerns? Or can DEQ just say "no, it's an existing use, we'll put you on a compliance schedule..., but you're a million dollar entity and should be able to figure out something to do with your pollution"?

Pete says at 2000 mg/L, which is what they're shooting for, at the biological low flow timeframe (which is what ND uses), they could be looking at numbers in the 2000-3000 range, which could kill off livestock due to brain swelling and copper deficiency.

Pete said the consulting firm did a good job looking at the data and did the correct calculations, but when you have that type of stream in ND in the wintertime, the base flow of zero or less than the cfs, and there's no room for aeration or anything, so once you put something in there it stays in there at that concentration for many miles. It doesn't just impact the short distance downstream; at 100 miles away you can still follow it. So it's a giant impact and it needs to be addressed.

Thanks,

Holly